

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
SOUTHERN DIVISION

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In re: SHARON RENE ROBERTS	)	Case No. 1:15-bk-14361-SDR
Debtor.	)	Chapter 13

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**MOTION TO AMEND DEBTOR'S MOTION TO DEEM MORTGAGE CURRENT TO  
ADD FREEDOM MORTGAGE AS A PARTY OF RECORD**

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**NOTICE OF HEARING**

**Notice is hereby given that:**

**A hearing on this Motion to Amend Debtor's Motion to Deem Mortgage Current to Add Freedom Mortgage as a Party of Record will be held on September 23, 2021 at 1:30 PM in Courtroom A of the U.S. Bankruptcy Court for the Eastern District of Tennessee, Historic U.S. Courthouse located at 31 East 11th Street, Chattanooga, TN 37402.**

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

**If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend the hearing, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.**

Comes the Debtor, Sharon Rene Roberts, ("Debtor") by and through counsel, and respectfully requests this Court for an order allowing the Debtor to amend her Motion to Deem Mortgage Current [Doc No. 74] and as Amended [Doc No. 115] to add Freedom Mortgage as a party to this matter, says as follows:

The Debtor received a Notice of Servicing Transfer from Home Point Financial, dated August 13, 2021, stating her loan has transferred from Home Point Financial to Freedom Mortgage effective September 2, 2021. Letter attached as Exhibit 1.

WHEREFORE, the Debtor requests this Court allow her Motion to Deem Mortgage Current, and as Amended, to include Freedom Mortgage as a necessary party of record to this matter.

Respectfully submitted,

RICHARD BANKS & ASSOCIATES, PC

/s/ Richard L. Banks  
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Cleveland, TN 37364  
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*Attorney for Debtor*

**CERTIFICATE OF SERVICE**

The undersigned attorney for the Debtor hereby certifies that a copy of the foregoing Motion to Amended Debtor's Motion to Deem Mortgage Current was served to:

Holly N. Knight, Esq. (via ECF and email)  
Knight Law Firm  
8161 Hwy 100 PMB 286  
Nashville, TN 37221  
hknight@knightlawpllc.com

Freedom Mortgage  
PO Box 50485  
Indianapolis, IN 46250-0485

This 25th day of August 2021

/s/ Richard L. Banks  
Richard L. Banks, BPR No. 000617